



July 19, 2021

Hon. Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Sq.
New York, New York 10007

Re: Norris v. Goldner et al (19-cv-5491): Adjournment Request

Dear Judge Nathan:

This firm represents Plaintiff in the above-referenced matter. I write pursuant to Your Honor's Individual Rules, with the consent of counsel for Defendants, to request an extension of 45 days to complete discovery.

Plaintiff's Position

Plaintiff believes, and recently learned, that after this case was filed, Defendants sought a loan from a financing institution and may have given the intellectual property subject to this litigation as collateral. Plaintiff needs additional time to obtain more information about the loan and the collateral in anticipation of the depositions and to conduct meaningful settlement negotiations. Plaintiff is not certain that Defendants have the required authority to settle this case given that the property at issue may not fully belong to them.

Defendants' Position

Plaintiff's counsel informed Defendants' counsel of this issue and its perceived relevance today, July 19, 2021. While Defendants dispute the relevance to this case, as the "loan" in question is believed to be a commonplace factoring agreement with a bank, if the circumstances surrounding this agreement would necessitate a second round of depositions, it would be in the best interest of all parties to obtain all documentation from the institution before conducting depositions. Therefore, Defendants consent to this request.

The Parties' Request for an Extension

Pursuant to Your Honor's Individual Rules, the parties have requested extensions of the Case Management Plan four times, and each was granted by the Court. Although the Court's most recent Order dated June 10, 2021, provides that "no further extensions will be granted" the new



information regarding the ownership of the intellectual property at issue is crucial to the effective resolution of this case. The parties are prepared to appear at a conference if the court so desires.

Respectfully Submitted,

/s/
Francelina M. Perdomo